



YELLOW CAB
SERVICE CORPORATION

RECEIVED

MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

May 27, 1993

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Washington, D.C. 20544

In the Matter of:

Replacement of Part 90 by)
Part 88 to Revise the Private)
Land Mobile Radio Services and)
Modify the Policies Governing)
Them)

P R Docket 92-235

To: The Commission

The proposed rule making as it affects the 150 mhz systems will severely impact taxicab companies operating on those systems. In the case of Yellow Cab Service Corp. which operates three companies in the Houston area and one company in Austin the impact on its continued operations would be devastating. The Yellow Cab Service Corp. through its Yellow Cab Company subsidiary in Houston dispatches over two and a half million (2,500,000) computer dispatch trips a year and transports over six million (6,000,000) passengers a year. Its Fiesta Cab Company subsidiary in Houston dispatches over four hundred thousand (400,000) computer dispatch trips a year and transports over six hundred fifty thousand (650,000) passengers a year.

Yellow Cab Service Corp.'s American Cab Company subsidiary in Austin dispatches over eight hundred thousand (800,000) computer dispatch trips a year and transports over one million three hundred thousand (1,300,000) passengers a year. Yellow Cab Service Corp. installed a computerized dispatch system in Austin in 1986 at a cost of over five hundred thousand dollars (\$500,000) and later installed a computerized dispatch system in Houston for the operation of Yellow Cab Company, Fiesta Cab Company and Towne Car in 1989 at a cost of over three and a half million dollars (\$3,500,000). In addition Yellow Cab has an investment of over two million two hundred fifty thousand dollars (\$2,250,000) in two-way radios in both Houston and Austin. The proposed rule changes would make an investment of over six million two hundred fifty thousand dollars (\$6,250,000) inoperable and severely impact the taxicab riding public of both Houston and Austin.

The proposal to reduce the permissible transmitting power levels for 150 mhz systems from 300 ERP to 75 ERP would make it impossible

278

May 27, 1993
Page 2

for Yellow Cab Service Corporation's taxicab companies in Houston to service the entire Metropolitan area. Yellow Cab Service Corp. services over two thousand four hundred (2,400) square miles in the Houston area and transports over six million six hundred fifty thousand (6,650,000) passengers a year. Our normal service area is greater than thirty five miles in all directions from Downtown

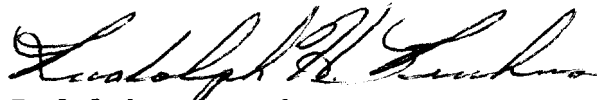
May 27, 1993

Page 3

cycle. The proposed rule changes have the potential to place such an economic burden on the taxicab industry that it could force some companies out of business.

The taxicab industry consists of over six thousand three hundred (6,300) taxicab fleets with over two hundred five thousand three hundred (205,300) vehicles, over fifty thousand (50,000) employees and over three hundred five thousand (305,000) drivers. The taxicab industry serves over two billion (2,000,000,000) passengers annually. One solution to protect and maintain a viable taxicab industry would be to exempt the 150 mhz taxicab frequencies from the proposed rule changes.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Rudolph H. Bruhns', written in a cursive style.

Rudolph H. Bruhns
Executive Vice President

RHB/nac